MORGAN, LEWIS & BOCKIUS LLP Counsel for Sumitomo Corporation 101 Park Avenue New York, New York 10178-0060 Telephone No.: (212) 309-6000 William C. Heuer, Esq. (WH-8217)

## IN THE UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

:

In re: : CHAPTER 11

DELPHI CORPORATION, et.al. : Case No. 05-44481 (RDD)

:

Debtors. : Jointly Administered

## NOTICE OF APPEARANCE, REQUEST FOR SERVICE OF PAPERS AND RESERVATION OF RIGHTS

PLEASE TAKE NOTICE that Sumitomo Corporation, by and through its undersigned counsel, hereby enters its appearance pursuant to Section 1109(b) of the Bankruptcy Code and Rules 2002 and 9010(b) of the Bankruptcy Rules requests that all notices given or required to be given in these cases, and all pleadings and other documents served and required to be served herein, be given to and served upon:

William C. Heuer, Esq.
Morgan, Lewis & Bockius LLP
101 Park Avenue
New York, New York 10178-0060
Telephone No.: (212) 309-6000
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-and-

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PLEASE TAKE FURTHER NOTICE that, pursuant to Section 1109(b) of the

Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in

the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of

any application, motion, petition, pleading, request, complaint or demand, whether formal or

informal, whether written or oral, and whether transmitted or conveyed by mail, delivery,

telephone, electronically or otherwise, which affects the Debtors or property of the Debtors.

PLEASE TAKE FURTHER NOTICE that, neither this notice nor any later

appearance, pleading, claim or suit shall waive Sumitomo Corporation's right (i) to have final

orders in non-core matters entered only after de novo review by a district judge, (ii) to trial by

jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto,

(iii) to have the United States District Court withdraw the reference in any matter subject to

mandatory or discretionary withdrawal or (iv) to any other rights, claims, actions, defenses,

setoffs, or recoupments to which Sumitomo Corporation is or may be entitled under agreements,

in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are

expressly reserved.

Dated: New York, New York October 13, 2005

MORGAN, LEWIS & BOCKIUS LLP

By: \_/s/ William C. Heuer\_ William C. Heuer (WH-8217)

101 Park Avenue

New York, New York 10178-0060

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-and-

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Attorneys for Sumitomo Corporation

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IN THE UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re: : CHAPTI

In re: : CHAPTER 11

DELPHI CORPORATION, et.al. : Case No. 05-44481 (RDD)

Debtors. : Jointly Administered

## **CERTIFICATE OF SERVICE**

I, William C. Heuer, hereby certify that on October 13, 2005, I caused copies of the attached Notice of Appearance, Request for Service of Papers and Reservation of Rights to be served by U.S. Mail upon counsel to the above-captioned Debtors.

Dated: New York, New York October 13, 2005

> /s/ William C. Heuer William C. Heuer